

FILED  
U.S. BANKRUPTCY COURT

IN THE MATTER OF

RAHUL DEV MANCHANDA

2024 JAN -9 P 1:45


S.D. OF N.Y.

INDEX NO. 23-22095

NOTICE OF MOTION

**PLEASE TAKE NOTICE** that upon the annexed affirmation of Rahul Manchanda duly affirmed the 8th day of January 2024, the annexed Memorandum of Law and Exhibits, and all the Pleadings and Proceedings heretofore had herein, the Undersigned will move this Honorable Court at US SDNY Bankruptcy Court, 300 Quarropas Street White Plains, NY 10601-4150 on January 10, 2024 at 10 AM or as soon as Counsel can be heard for an order holding Douglas Senderoff, Michael Druckman, David Lin, Brett Lewis, Lewis & Lin LLC in Civil and Criminal Contempt of Court pursuant to U.S. Federal Bankruptcy Law, for filing a false 410 claim pursuant to 18 U.S.C. §§ 152, 157, and 3571, as well as for purposefully evading service of process or answering a complaint in 23-CV-7637.

**Dated:** January 8, 2024  
New York, NY

  
 Rahul Manchanda, Esq.  
 Manchanda Law Office PLLC  
 270 Victory Boulevard  
 New Rochelle, New York 10804  
 Tel: (212) 968-8600  
 Fax: (212) 968-8601

To: Douglas Senderoff, Michael Druckman, David Lin, Brett Lewis,  
Lewis & Lin LLC via e-mail and U.S. mail.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN THE MATTER OF ) INDEX NO. 23-22095  
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RAHUL DEV MANCHANDA ) AFFIRMATION IN SUPPORT  
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STATE OF NEW YORK            }  
                                  : ss  
COUNTY OF WESTCHESTER    }

**RAHUL MANCHANDA**, an Attorney duly licensed to practice law in the State of New York, affirms the following to be true under penalty of perjury:

1. I make this Affirmation in support of this Motion for Contempt of Court against Defendants in all respects based upon my personal knowledge of the facts and experiences that I relate herein, based upon information and belief, and based on the contents of the file.
2. On the grounds that these people, in addition to their meritless vexatious litigation against Debtor spanning from October 2018 to the present day, with absolutely no proof, evidence, or judgment in their favor, plus a current pending lawsuit against them by Debtor in the SDNY case index number 23-CV-

7637 alleging intentional torts and conduct directly dealing with their Form 410 herein, where they are actively evading service and not putting in an answer or appearance, have now exceeded the bounds of federal bankruptcy law committing fraud by filing a false claim 410 in violation of 18 U.S.C. §§ 152, 157, and 3571.

3. Pursuant to 18 U.S.C. § 152, "A person who...(2) knowingly and fraudulently makes a false oath or account in or in relation to any case under title 11...(3) knowingly and fraudulently makes a false declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, in or in relation to any case under title 11...(4) knowingly and fraudulently presents any false claim for proof against the estate of a debtor, or uses any such claim in any case under title 11, in a personal capacity or as or through an agent, proxy, or attorney...shall be fined under this title, imprisoned not more than 5 years, or both."
4. Pursuant to 18 U.S.C. § 157, "A person who, having devised or intending to devise a scheme or artifice to defraud and for the purpose of executing or concealing such a scheme or artifice or attempting to do so...(2) files a document in a proceeding under title 11...or (3) makes a false or fraudulent representation, claim, or promise concerning or in relation to

a proceeding under title 11, at any time before or after the filing of the petition, or in relation to a proceeding falsely asserted to be pending under such title, shall be fined under this title, imprisoned not more than 5 years, or both."

5. As was stated above, neither of the individuals named above has any reason to believe that they have any proof of claim, because there simply is no proof of such.
6. Additionally, Douglas Senderoff names himself as a "creditor" in Part 3, filed it on or about January 4, 2024, which is a fraudulent claim punishable by a fine up to \$500,000, imprisoned for up to 5 years, or both pursuant to 18 U.S.C. § 3571.

**WHEREFORE**, it is respectfully requested that this Motion be granted in all respects together with such other and further relief as this Honorable Court deems to be just and proper, including contempt, costs, penalties, fines, incarceration, and sanctions against Defendants for wilful violation of 18 U.S.C. §§ 152, 157, and 3571, as well as for purposefully evading service of process or answering a complaint in 23-CV-7637.

**Dated:** January 8, 2024  
New York, NY

  
\_\_\_\_\_  
Rahul Manchanda, Esq.

**Fill in this information to identify the case:**Debtor 1 RAHUL DEV MANCHANDADebtor 2  
(Spouse, if filing) \_\_\_\_\_

United States Bankruptcy Court for the: Southern District of New York

Case number 23-22095**Official Form 410****Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

1. Who is the current creditor?

Douglas Senderoff

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?

☒ No☐ Yes. From whom? \_\_\_\_\_

3. Where should notices and payments to the creditor be sent?

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?

Douglas Senderoff, MD C/O Lewis & Lin LLC

Name

77 Sands Street, 6th Floor

Number Street

Brooklyn

NY

11201

City

State

ZIP Code

Contact phone 718-243-9323Contact email office@ilawco.com

Where should payments to the creditor be sent? (if different)

Name

Number Street

City

State

ZIP Code

Contact phone \_\_\_\_\_

Contact email \_\_\_\_\_

Uniform claim identifier for electronic payments in chapter 13 (if you use one):  
\_\_\_\_\_

4. Does this claim amend one already filed?

☒ No☐ Yes. Claim number on court claims registry (if known) \_\_\_\_\_

Filed on

MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

☒ No☐ Yes. Who made the earlier filing? \_\_\_\_\_

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6.	Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____	
7.	How much is the claim? \$ _____	Does this amount include interest or other charges? <input type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).	
8.	What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.  <u>Tort claims - Senderoff v. Manchanda, No.152538/2019, NY Cty.</u>	
9.	Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property.	Nature of property: <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____  Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)  Amount necessary to cure any default as of the date of the petition: \$ _____  Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10.	Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition.	\$ _____
11.	Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____	



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

Amount entitled to priority

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

### Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☒ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date

01 04 2024  
MM-TT-DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name

Douglas Senderoff

First name

Middle name

Last name

Title

Company

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

461 Park Avenue South, 7th Floor

Number Street

New York

NY

10016

City

State

ZIP Code

Contact phone

212-481-3939

Email

info@drsenderoff.com

## **CERTIFICATE OF SERVICE**

On January 8, 2024, I, Rahul Manchanda, served a copy of this Notice of Motion for Contempt of Court and any attached pages to Douglas Senderoff, Michael Druckman, David Lin, Brett Lewis, Lewis & Lin LLC located at 77 Sands Street, 6<sup>th</sup> Floor, Brooklyn New York 11201 via U.S. mail.



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